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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO CASTRO,

Defendants.

Case No. 2:19-cr-00295-GMN-NJK

**STIPULATION RE: MARIO
CASTRO'S EXHIBITS [ECF NO. 457,
523]**

IT IS HEREBY STIPULATED AND AGREED by and between the defendant
MARIO CASTRO, and the UNITED STATES OF AMERICA, through their attorneys, as
follows:

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Emails

- 1) The following defense exhibits are true and correct copies of emails to and from the indicated sender(s) and recipient(s) and are admissible in evidence:

Exhibit	Description
5001	150302 Emails Between S. Marces Digital Express and Mario Castro
5002	150421 Emails Between S. Marces Digital Express and Mario Castro Digital Express
5003	150429 Emails Between S. Marces and Mario Castro Digital Express
5004	150602 Emails Between S. Marces and Mario Castro Digital Express
5005	150613 Emails Between S. Marces and Mario Castro Digital Express
5006	170213 Emails Between S. Marces and Mario Castro Digital Express
5007	170316 Emails Between S. Marces and Mario Castro Digital Express
5008	170921 Emails Between S. Marces and Mario Castro Digital Express
5009	171110 Emails Between S. Marces and Mario Castro Digital Express
5027	Mario Castro Patricia Kern Emails May 15, 2014 to August 25, 2017

Proffer, Cooperation, and Plea Agreements

- 2) Defense Exhibit 5018 is a true and correct copy of Patricia “Patti” Kern’s Proffer Agreement, and is admissible in evidence.
- 3) Defense Exhibit 5019 is a true and correct copy of Patricia “Patti” Kern’s Plea Agreement, and is admissible in evidence.

- 1 4) Defense Exhibit 5020 is a true and correct copy of Patricia “Patti” Kern’s Cooperation
2 Agreement, and is admissible in evidence.
- 3 5) Defense Exhibit 5021 is a true and correct copy of Sean O’Connor’s Proffer
4 Agreement, and is admissible in evidence.
- 5 6) Defense Exhibit 5022 is a true and correct copy of Sean O’Connor’s Plea Agreement,
6 and is admissible in evidence.
- 7 7) Defense Exhibit 5023 is a true and correct copy of Sean O’Connor’s Cooperation
8 Agreement, and is admissible in evidence.
- 9

10 **Belt Cutter Machine Photo**

- 11 8) Defense Exhibit 5030 is a true and correct copy of Belt Cutter GS 10-2 image, and is
12 admissible in evidence.
- 13

14 Respectfully submitted this 25th day of September 2022.

15 **FOR THE GOVERNMENT**

FOR THE DEFENDANT

16 U.S. ATTORNEY’S OFFICE
17 FOR THE DISTRICT OF NEVADA

18
19 /s/ Daniel Zytneck
20 TIMOTHY FINLEY
21 DANIEL ZYTNICK
22 Trial Attorneys

/s/ Richard Tanasi & Joshua Tomsheck
RICHARD TANASI, ESQ. (9699)
JOSHUA TOMSHECK, ESQ. (9210)
Counsel for Mario Castro

23 **ORDER**
24 IT IS SO ORDERED.

25 
26 HON. GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE

Dated: September 25, 2022